

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
:  
UNITED STATES OF AMERICA  
:  
- v. -  
:  
BILLY ORTEGA,  
a/k/a "Jason,"  
KAYLEN RAINEY, and  
WILLIAM DRAYTON,  
:  
Defendants.  
:  
- - - - - x

INDICTMENT

22 Cr.

22 CRIM 091

COUNT ONE  
(Narcotics Conspiracy Resulting in Death)

The Grand Jury charges:

1. From at least in or about 2020, up to and including in or about 2021, in the Southern District of New York and elsewhere, BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINEY, and WILLIAM DRAYTON, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINEY, and WILLIAM DRAYTON, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled

substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINEY, and WILLIAM DRAYTON, the defendants, conspired to distribute and possess with intent to distribute were: (i) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (ii) mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

4. The use of such controlled substances, which had been distributed by BILLY ORTEGA, a/k/a "Jason," and KAYLEN RAINEY, the defendants, on or about March 17, 2021, resulted in the deaths of Julia Ghahramani, Amanda Scher, and Ross Mtangi.

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATION**

5. As a result of committing the offense alleged in Count One of this Indictment, BILLY ORTEGA, a/k/a "Jason," KAYLEN RAINEY, and WILLIAM DRAYTON, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of,

said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

**Substitute Assets Provision**

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

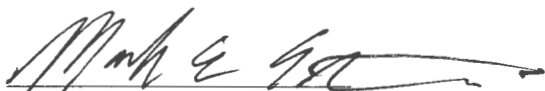
(c) has been placed beyond the jurisdiction of the Court;


(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney

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(21 U.S.C. § 846.)

DAMIAN WILLIAMS

United States Attorney

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Foreperson

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2/10/22

Filed Indictment +  
Case assigned to Judge Abrams

USAT Foreperson

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